

The preliminary report was released for public comment on May 8, 2014. Comments were due by close of business on May 20. The following persons and organizations submitted comments:

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| Abel Collins | RI Sierra Club |
| Ames Colt | RI Bay, Rivers and Watersheds Coordinating Team |
| Mara Freilich | Resilient RI Team |
| Peter Galvin | |
| Greg Gerritt | |
| Topher Hamblett | Save The Bay |
| Representative Art Handy | |
| Dr. Caroline Karp | Center for Environmental Studies, Brown University |
| Martha Jones | |
| Meg Kerr | |
| Dan Kopin | |
| Eugenia Marks | Audubon Society of RI |
| Kenneth Payne | |
| Charity Pennock | New England Clean Energy Council |
| Pam Rubinoff | RI SeaGrant |
| Brigid Ryan | Emerald Cities Providence |
| Allen Smith | |

| Comment | Commenter(s) | Response |
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| Recommendations- organization: reorganize into Key Principles, 2014 actions by General Assembly, 2014 actions by Governor, actions in 2015 and beyond; organize actions by timeframe | Galvin, Payne | <i>Recommendations reorganized.</i> Action Plan organization (by goal and objective) generally retained. |
| Recommendations- Key Principles -various edits | Galvin | <ul style="list-style-type: none"> • We see examples of people trying to turn it into a debate every day. It is important to be clear this is not the venue. • These are short statements of principles. Terms are defined in document. • (3) changed to “..., while avoiding increased bureaucracy.” • (5) is in fact about not adding regulatory process (and streamlining where possible) • Producing specific sets of numbers, criteria, etc. as requested by Jon Reiner and others is properly included under Goals 1, 2 and 7, instead of as a Principle. |
| Recommendations- Legislation -Climate Change: general | Galvin | EC3 report is not the proper vehicle for legislative amendments. Draft amendments addressing several comments, including public involvement, science advisory committee, have been submitted to bill sponsors. |
| Recommendations- Legislation -Climate Change: agency powers and duties | Galvin | “Consideration of climate change” is hard to object to. “Requirement to consider” is unnecessary given the reference to “duties.” |
| Recommendations- Legislation -Climate Change: set higher emission reduction goals | Collins, Freilich, Galvin, Handy, Ryan, Smith, | Council defers to DEM; notes that 10% reduction by 2020 is NOT a given as suggested by some commenters but depends on expansion and acceleration of existing programs; believes that attainment of 2020 goal would serve to build needed public and political support; sees 45% reduction by 2035 as an aggressive interim target that will drive expansion, innovation, etc.; and is concerned that insisting on higher goals at this time unnecessarily complicates chances of getting legislation passed this year; <i>suggests instead periodic evaluation by agencies of feasibility to adjust goals</i> (possible amendment to senate bill). |
| Recommendations- Legislation -Climate Change: add interim emission reduction goals | Hamblett | Council defers to DEM, <i>suggests periodic evaluation by agencies of feasibility to adjust goals</i> (possible amendment to senate bill). |

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| Recommendations- Legislation -Climate Change: add members to council | Collins, Galvin, Karp, Kopin, Ryan | Council prefers flexibility (as provided in senate bill) for Governor to add members instead of expanding council at this time with offices that may need to be part of the larger effort but not necessarily of the coordinating council. Agrees DBR/Insurance Commissioner should probably be added. (Housing and workforce development included in suggested amendment to senate bill.) |
| Recommendations- Legislation -Climate Change: limit number of advisory bodies with “stakeholders,” keep lines of authority clear between Governor’s Office, Cabinet and Legislature, do not create “watchdog” to oversee Governor’s directors. | Karp | No response required. |
| Recommendations- Legislation -Climate Change: add provision re: food waste (or endorse separate legislation?) | Galvin | Council is concerned that late additions to climate change bill complicate chances of passage; supports diversion of food waste legislation. <i>New Action 5.7.1 added</i> |
| Recommendations- Executive -2014 | Galvin | <i>Recommendations adopted</i> |
| Recommendations- Executive -2015 and beyond | Galvin | |
| GOAL 1 – LEAD BY EXAMPLE | | |
| Incorporate climate change mitigation and adaptation into agency strategic plans | Handy | <i>Added to Action 1.1.4</i> |
| Interagency Teams (1.1.5): “cajoling” not necessary | Colt | The concept is critical to many of the strategies, yet not common practice. Also easy and important to measure if successful. |
| Metrics for use by agencies to track CC activities (1.2.2) should not be short-term priority for EC3; BRWCT proposes to work with OMB on this | Colt | Council believes it is needed to assist agencies, and expertise is available to develop them. If BRWCT can help produce them quickly, it should be listed as OCR |
| State should do more demonstration projects, for example to guide building retrofits and land management so as to reduce emissions, risk and cost | Karp | Action items 1.1.2-1.1.4, 1.2.2-1.2.3, 1.2.5-1.2.6 encourage activities that can produce demonstration projects, and there are several state projects that demonstrate energy use and emission reduction, and/or adaptation measures that reduce risk. <i>Council suggests this is also a good topic under Goal 3 (new 3.1.3), and should be revisited in the Strategic Plan for key demonstration projects).</i> |
| Identify explicitly how energy efficiency, renewable energy and conservation efforts will be funded (or targets and goals will not be achieved) | Ryan | OER has a \$1 million revolving loan fund as well as RGGI funding to support these efforts |
| Expand Employee program beyond VMT (1.2.8) | Kerr | Recommendation is not limited to VMT (says “such as”). |
| Identify laws and regulations that create risk or undermine ability to reduce risk or improve resilience | Karp | <i>New Action 1.2.9 added.</i> |
| Objective 1.3-Data Collection etc.: combine with Goal 4 (Vulnerability Assessments) and Goal 7 (Coordinate Scientific and Technical Support) or at least provide clear cross-referencing | Colt | Although there is overlap, there are also reasons to separate the goals and objectives. <i>Cross-references have been added.</i> |

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| Include invasive species in examples of impacts in Objective 1.3 | Colt | <i>Done</i> |
| Include CRMC as OCR in 1.3.1 | Colt | Already listed. Planning or BRWCT listed as possible co-lead. |
| Not clear what statewide planning criteria (1.3.3) would be, in addition to, for example, FIRMS, or that 9/30 is realistic deadline | Colt | Action is response to urgent plea from municipalities and not questioned by OPR and OCR agencies (planning, CRMC and RIEMA) |
| 1/1/15 not realistic deadline for Statewide Strategic Plan (1.4.1), need 1 year | Colt | We will give it our best. |
| Annual summits: include updates on research and implementation of Actions, as well as student/class presentations | Rubino | Agreed. |
| Report needs more emphasis on transparency and effective opportunity for public comment | Karp | See Key Principles (#5) and Goal 8. Latter has not yet been fully developed, in part because it takes time to translate commitment to accountability, transparency and public engagement into a meaningful as well as streamlined and expeditious process, using the best available tools. |
| GOAL 2 - PARTNER WITH LOCAL GOVERNMENT, FEDERAL GOVERNMENT, PRIVATE SECTOR AND HIGHER EDUCATION | | |
| Re: clearinghouse website for municipal planners (2.1.2): first convene team to evaluate existing sites, formats, audiences, gaps, need for new site or opportunity to use existing one(s) | Rubino | <i>Language added under How in 2.1.2</i> |
| Re: technical assistance to municipalities by URI/CRC (2.2.3): commitment is in place but funding (beyond pilot project scale) is not; change OPR to RIEMA | Rubino | This Action was proposed by URI and included as separate action to support Action 2.2.2., led by state agencies. If RIEMA becomes OPR, the two actions become duplicative. Council prefers to <i>emphasize</i> the importance of this capacity at URI and the <i>need to address funding options and resource allocation up front, under How in 2.2.3</i> |
| Re: notice to municipalities of funding opportunities to implement projects in Hazard Mitigation Plans (2.2.4): include Local Comprehensive Plans, as well | Galvin | Proposed Action is specific to funding sources RIEMA has access to. <i>Added note to 2.2.4 encouraging RIEMA and Division of Planning to consider joint effort and do the same for both HMPs and LCPs.</i> |
| Add the Office of the Attorney General as support for providing guidance and technical assistance (Objective 2.3) and add Action regarding guidance to real estate practitioners and property owners regarding legal notification requirements at time of sale | Galvin | Council agrees there are important legal issues involving climate change and private property that need to be addressed as a matter of both law and policy. The issue raised here is beyond Objective 2.3. <i>A new objective 1.4 and Action 1.4.1 have been added under Goal 1.</i> |
| In addition to providing technical assistance in developing municipal energy use reduction plans (2.3.2), develop low-cost funding mechanism (in addition to or to leverage ESCO funding) | Ryan | OER has a \$1 million revolving loan fund as well as RGGI funding available. Developing additional funding strategies is also part of SEP and can be part of Resilient Economy Collaborative agenda (2.5.1). |
| Re: planning in 2014, anticipated launch in 2015: Some things need to get done in 2014. PACE guidance has been out but communities aren't acting. If distributed generation legislation passes, implementation team should get this moving right away or we'll lose the certainty industry needs to start a big expansion. | Galvin | OER is already working with CommerceRI on outreach program for municipalities, and planning to build on that effort to accommodate growth as result of DG expansion; current priority is reducing issues encountered by solar installation projects. |

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| Develop strategies to manage storm debris locally without unnecessarily filling up scarce landfill space | Marks | <i>Added new Action 2.3.3; also cross-referenced under Goals 3 and 6.</i> |
| Broaden assessment of lessons learned from North Kingstown project (2.3.3) to include Matunuck and Cranston) | Colt | Proposed Action (now 2.3.4) is based on specific project proposal that needs additional funding to be completed (and produce a tool that could be used by other municipalities). <i>Have instead added a note to encourage consideration of experiences in other communities, including Cranston, Newport and Matunuck.</i> |
| Resilient Economy Collaborative-financial strategies team for utilities (2.5.2): note BRWCT proposal for Integrated Planning Framework Task Force that could take this on for storm water, wastewater and drinking water, first for upper Bay region, then statewide | Colt | If BRWCT is going to pursue this, it can be <i>added as OCR</i> and perhaps play a lead role with respect to the water utilities part of the agenda. Early coordination with CommerceRI, DEM and DOH is important. <i>NBC needs to be added, as well.</i> |
| GOAL 3 – ECONOMIC OPPORTUNITY | | |
| Various comments about sustainability, green economy, steady-state or shrinking economy | Gerritt, Karp | The council simply recognizes there are economic opportunities, not only negative impacts, and that this can be helpful as a practical matter in advancing both mitigation and adaptation. While appreciating the comments, the council declines to discuss them in the report, consistent with key principle #1. |
| Include DLT and other workforce development representatives in Resilient Economy Collaborative (3.1.1) | Ryan | <i>DLT added as OCR</i> |
| Add new 3.1.3. Explore the role that renewing tax incentives could play in the initial development of resiliency related industries in the state, including what has worked in other states. | Galvin | Council recommends that the Resilient Economy Collaborative financial strategy team (2.5.1) include tax policy in the scope of its analyses. |
| GOAL 4 – VULNERABILITY ASSESSMENTS | | |
| This important objective (4.1) needs some prioritization or dates at this point -- i.e. decide what Chafee administration can do before the end of the term. Vulnerability of energy infrastructure, for example, falls into this category. | Galvin | Draft report should have shown, under When in 4.1.1, target date of no later than 11/1/14 for core team, and no later than 1/1/15 for assessments to begin. Similarly, under How, text now shows that clarifies RIEMA already has programmatic structure that can/should be applied. |
| Clarify that “rapid assessments” (4.1.1) are proactive, not post-disaster. Several suggestions for “How” | Rubinoff | <i>“Proactive” added to Objective 4.1 as well as Action 4.1.1. Language added under How.</i> |
| Add workforce development sector representation to working group for assessments of prioritized sectors of economy (4.2.1) | Ryan | <i>DLT added as OCR</i> |
| Re: working groups to conduct assessments for prioritized sectors of economy (4.2.1): URI/CRC and RISG can contribute experience from Newport Waterfront project | Rubinoff | <i>Language added under How</i> |

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| Add new 4.1.11 - In preparing vulnerability assessments, include an evaluation of the type of training required of the workforce to limit such vulnerabilities, the current and expected availability of such trained personnel, the educational and on-the-job training programs that could facilitate any needed expansion of that workforce, and the potential competition for that workforce from nearby states. Engage the trades, schools, and businesses. | Galvin | <i>Added, with cross-reference to Objective 4.2 (public-private assessment of vulnerabilities and opportunities)</i> |
| GOAL 5 - MITIGATION | | |
| Need “mandated action explicitly focused on reducing dependence on fossil fuel” | Freilich | Council is not sure what this means, but believes that statutory emission reduction goals will help drive programs that reduce such dependence in all sectors, including the transportation sector. |
| Add to end of Action 5.1.3: “and give priority to the addition of renewable resources to meet growing demands in lieu of expanding natural gas pipelines to or through the state.” | Galvin | Action 5.1.3 addresses the important issue of methane gas escaping from pipelines. Council prefers not to change the content to one of advocating against pipeline expansion. On that issue, council stands behind legislation that has been introduced that seeks to achieve an adequate, diverse and sustainable supply of energy, including significant expansion of renewable energy. |
| Add new Objective and several action items relating to deep energy retrofits: conducting them on state buildings, strengthening existing rebate programs, and creating a dedicated source of funding to be leveraged with other public and private funding sources. | Ryan | First recommendation would belong under Lead by Example and is covered by 1.2.5 (plan for net zero energy usage) and 1.2.6 (Public Energy Partnership). Second and third one are included in SEP strategies already; can also be linked to Resilient Economy Collaborative financial strategy teams (2.5.1 and 2.5.2) |
| Under Objective 5.3 (Optimize energy efficiency in electric, thermal and transportation sectors), add Action: expand the use of biofuels to provide thermal energy | Galvin | This is covered by Action 5.5.1 |
| Regarding 5.3.2 (sustainable funding for energy efficiency programs for unregulated fuels): if we're talking biofuels, this is great - an example would help clarify this for the record | Galvin | Action 5.3.2 is targeted to property owners heating with oil who have currently no access to funding stream for energy efficiency measures. |
| More focus on infrastructure to increase public transportation | Smith | See item iii under Action 5.3.3. Council agrees that emission reductions in transportation sector is a follow-up priority |
| In 5.3.5 (congestion mitigation) add "provided that priority in relieving congestion should be given to the expansion of mass transit, bike lanes, walking paths, and other alternatives that would reduce carbon emissions." | Galvin | This Action was proposed specifically to acknowledge and help advance a major mitigation opportunity. It does not suggest that highway construction is the way to achieve congestion mitigation. |
| Add a new Action item under Objective 5.4 – “Encourage, and as appropriate require, the use of storage technologies to maximize the availability of renewable energy.” Other states are doing this and it is very important if we are to move ahead expeditiously. | Galvin | This addresses in the update of the State Energy Plan, and also being discussed with ISO New England. |

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| Under Objective 5.5, add Action to develop comprehensive workforce development strategy maximizing employment and training opportunities in clean energy and resiliency industry | Ryan | <i>Added new Action 3.1.3 under Goal 3, instead</i> |
| Regarding Objective 5.7 (was 5.6, non-energy emissions from waste and agriculture): The first item, waste, should be dealt with this year in part by legislature in food waste bill (our number one methane source), [and to remind them of the need to remove all remaining cesspools. Another set of issues for the executive branch to address is how to deal with expected failure of existing septs and sewers as water table rises, and this should include exploration of eco-toilets (required in Falmouth Mass). Agriculture should be expanded to say "agriculture and homeowners"; the problem here is nitrous oxide, which is actually a much more damaging greenhouse gas than methane, but which should be easy to control.] | Galvin, Handy | Council supports passage of food waste diversion legislation. <i>Action 5.7.1 added.</i> Flooding of wastewater systems is included in scope of vulnerability assessments under Goal 4. The other issues require follow-up by/with DEM and will be addressed in the Strategic Plan. See also <i>Notes added under Other Actions under Objective 5.8</i> |
| Add at the end of 5.7.2 (evaluate barriers municipalities are facing in implementing smart growth measures) "including whether enactment of a single set of state rules might facilitate action" | Galvin | Council does not believe it is prudent to use this as an example. |
| GOAL 6 - ADAPTATION | | |
| Coastal properties at risk must be managed in way that protects public trust interests in access along the shore, use and conservation of marine waters and natural resources. | Karp | <i>Added to legal (and policy) issues that need to be addressed. See new 1.4.1</i> |
| Develop state insurance pool and/or local risk-based assessment collected as part of property tax | Karp | Council recommends research, documentation and evaluation of various funding strategies as part of Actions 2.5.1 and 2.5.2 (Resilient Economy Collaborative financial strategies teams) |
| Develop statewide lease-back and transferable development rights (TDR) programs with land bank to facilitate retreat from high flood hazard areas, funded with real estate tax | Karp | Council recommends research, documentation and evaluation of various funding strategies as part of Actions 2.5.1 and 2.5.2 (Resilient Economy Collaborative financial strategies teams). Also see 6.5.1 (make vulnerable areas "sending zones" for TDR programs) |
| Make flood insurance mandatory for properties in (coastal and inland) areas of high risk of inundation or storm surge, and make requirement run with the land | Karp | Council notes this is a long-standing policy and political issue that needs to be resolved. |
| Regarding Objective 6.2 (prioritize, develop and implement adaptation strategies and action plans): The action items to implement this objective are too limited. For example, include homeowner wastewater treatment, food supply disruptions, etc. I would recommend a review of the objective as a whole and development of an implementation plan by end of 2014. | Galvin | This is not a comprehensive plan. As stated in the report and in Action 1.5.1, the intent is to develop a more comprehensive strategic plan by the end of 2014. |

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| When conducting vulnerability assessments and developing adaptation strategies, disaggregate data by race, income, age and geography (urban vs rural) | Freilich | Council agrees this is preferable in many instances, but reluctant to endorse across-the-board requirement given resources and other constraints that may apply; suggest collaboration with academic institutions may be one way to address this. |
| Re: building capacity for waterfront business sector to incorporate climate change into business strategies (6.4.3): make CommerceRI and CRMC OPR instead of URI (CI or CRC) or RISG, given limited funding | Rubinoff | This Action was proposed by URI and included because of opportunity to support action by state agencies. Council prefers to <i>emphasize</i> the importance of this capacity at URI and the <i>need to address funding options and resource allocation up front, under How in 6.4.3</i> . Note there is need and opportunity to reach out to URI business program(s), as well. An alternative approach would be to pursue this project under banner of the Resilient Economy Collaborative (Actions 2.5.1, 3.1.1). |
| Re: working group to address sustainable funding for protection/restoration of coastal wetlands (6.5.4): build on work of SLAMM (Sea Level Affecting Marshes Model) working group facilitated by CRMC and URI/CRC | Rubinoff | Agreed. <i>Language added to How in 6.5.4</i> . Note that intent of proposed Action is not to duplicate work of SLAMM group but to elevate the longer term strategy and in particular funding issues in accordance with its findings. |
| Natural Resources (Objective 6.6): need more emphasis on inland, including riverine, resources, as well, not just coastal; incorporate into local plans, state wildlife action plan, bonds; include land trusts and watershed organizations | Hamblett, Kerr, Rubinoff | Agreed. <i>Language added in Notes under 6.6</i> . Short term priority is for agencies (and partners) to coordinate on how to address this priority with limited resources. |
| Need to continuously track best mitigation and adaptation practices elsewhere, not just in terms of science | Kerr | See Action 8.11. Council agrees this needs to be addressed further under Goals 1 and 2. |
| GOAL 7-SCIENCE AND TECHNICAL SUPPORT | | |
| Advisory and Coordinating Committee-role of BRWCT | Colt | If the comment suggests that the committee itself should be relatively small, but be able to network effectively in a larger context, and thereby tap into available expertise as needed in an efficient manner, the council agrees. An unresolved question remains how many “coordinating” entities already exist, whether a new one is really needed. |
| Add to 7.1.1(4) “and provide recommendations on the goals and methods for reducing greenhouse gas reductions.” | Galvin | Council believes that the advisory committee will assist the council as necessary in all matters the council is dealing with and on which scientific and/or technical support is needed. That may include providing the council, at its request, with information about goals and methodologies for emission reductions. Neither the council nor the advisory committee, however, have the authority that DEM has in this matter, and council proceedings, including proceedings of its advisory committee(s), should not interfere with that authority. This principle applies equally to the authority of other agencies. <i>Clarifying language added to 7.1.1 as new (4)</i> . |

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| In Objective 7.2 (ensure convenient and reliable access), insert "to the best available scientific and technical information" | Galvin | <i>Done</i> |
| GOAL 8-COMMUNICATION | | |
| Because climate change affects every facet of life in Rhode Island, we recommend public availability of studies and reports as well as community review meetings and workshops for developing and reviewing plans. | Freilich | Council recognizes that public awareness, access to information and engagement in planning and decision-making is key to developing successful adaptation strategies. See Key Principle 10. Studies and reports will be publicly available in accordance with existing public policy. Participants will share responsibility to create and use meaningful opportunities for public review, comment and input that enhance projects and help them move forward as the urgency of circumstances may require. |
| Re: modular outreach program (8.3.1): NBNERR Coastal Training Program might be natural coordination lead, steering committee includes many of the OCRs | Rubinoff | <i>NBNERR added to OCRs. Language added to How.</i> |
| MISCELLANEOUS | | |
| Role of RI SeaGrant in various Actions, distinction between RISG and URI departments | Rubinoff | <i>Changes made in 1.3.4, 2.2.3, 2.3.4, 4.1.7, 7.1.1, 8.1.1, 8.3.1</i> |
| Strong support for work of EC3, in particular following components of report: Lead by Example, Pursue Economic Opportunities, Partner with Local Government and Private Sector, and Increase Resilience through Mitigation | Pennock | |
| Oppose Governor's initiative; disband EC3; remove any funding | Jones | |
| Convert UTC buses to LNG, Slater Mill to hydro plant, research feasibility of electricity generation by waves, and build nuclear plant at Quonset | Jones | |